



To Gayle Rosander/D09/Caltrans/CAGov
cc
bcc
Subject Fw: Talking Points for Public Hearings on DOE's Draft Yucca Mountain EISs

Here's what Nevada has to offer.

Sent from my BlackBerry Wireless Device

----- Original Message -----

From: "Joe Strolin" [jstrolin@nuc.state.nv.us]

Sent: 11/15/2007 03:44 PM

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Subject: Talking Points for Public Hearings on DOE's Draft Yucca Mountain EISs

FYI - Attached are some general taking points dealing with the two environmental impact statements that are the subject of public hearings in Nevada, California (Lone Pine) and Washington, DC. Hearings are scheduled at the following cities/communities:

- * Reno/Sparks, Nevada. Reno-Sparks Convention Center, 4590 S. Virginia Street, November 19, 2007, from 4 to 7 p.m.
- * Town of Amargosa Valley, Nevada. Longstreet Inn & Casino, Highway 373, November 26, 2007, from 4 to 7 p.m.
- * Goldfield, Nevada. Goldfield School Gymnasium, Hall & Euclid, November 27, 2007, from 4 to 7 p.m.
- * Lone Pine, California. Statham Hall, 138 N. Jackson Street, November 29, 2007, from 4 to 7 p.m.
- * Las Vegas, Nevada. Cashman Center, 850 Las Vegas Blvd., December 3, 2007, from 4 to 7 p.m.
- * Washington, D.C. Marriott at Metro Center, 775 12th Street, N.W., December 5, 2007, from 2 to 5 p.m.

If you plan to comment at any of the hearings, you can call **1-800-225-6972** to reserve a 5 minute time slot. You can also sign up to comment at the hearing, but you would be scheduled after those who have reserved slots by calling the 800 number.

More information is available in the DOE press release that's on the web at:
http://www.ymmp.gov/info_library/newsroom/documents/Press_Release_EIS_10-05-07_Final.pdf

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(775) 687-5277 (Fax) TALKING POINTS-Reno EIS Hearing.pdf

TALKING POINTS DOE'S EIS HEARINGS

There are actually 3 draft NEPA documents that DOE has issued for review and comment. One is a supplement to the 2002 Yucca Mountain final EIS. The other two are combined in one document dealing with (a) the evaluation of potential rail corridors to Yucca Mountain and (b) the actual selection of a rail alignment within the proposed Caliente corridor. The actual titles of the two documents are as follows:

- (1) Draft Supplemental Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (Draft Repository SEIS)
- (2) Draft Supplemental Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada – Nevada Rail Transportation Corridor (Draft Nevada Rail Corridor SEIS) and Draft Environmental Impact Statement for a Rail Alignment for the Construction and Operation of a Railroad in Nevada to a Geologic Repository at Yucca Mountain, Nye County, Nevada (Draft Rail Alignment EIS)

The Draft Repository SEIS

- The draft repository SEIS deals primarily with DOE's decision to alter the design of repository surface facilities to incorporate the concept of Transportation, Aging and Disposal (TAD) canisters. TADs are intended to simplify handling of spent fuel at the repository by having waste loaded into welded canister at the reactor sites. Then, using a series of different overpacks, the TADs can be stored at the reactors, transported to the repository, stored or aged at the repository surface facility, and ultimately disposed of underground, all without ever having to re-handle the actual spent fuel.
- While in theory, TADs would simplify repository surface facility design and operations (by reducing the need for extensive SNF handling facilities), the reality is that the effect is to transfer risks and impacts from the repository to the reactor locations where the handling operations would take place. The final SEIS needs to comprehensively assess risks and impacts to workers, facilities, communities and the environment at all of the reactor locations where TADs would have to be used.
- TADs also complicate waste transportation. Many reactor sites already have (or are in the process of implementing) on site dry storage facilities using multi-purpose (storage/transport) container systems that are not compatible with TADs and would require either repackaging of the SNF into TADs prior to transport or the use of non-standard transport vehicles.

- TADs can only be shipped via rail or by very large, oversized/heavy-haul trucks. Because rail access is NOT available at Yucca Mountain, and there is not guarantee it ever will be, the SEIS should have assessed the impacts of a TAD-based transportation system that can not use rail as the primary mode of transportation to Yucca.
- There are no final TAD designs in the draft SEIS, so it is difficult to assess how TADs will impact the repository system, including the transportation components.
- Costs and financial arrangements for the use of TADs are unknown. \
- The proposed TAD system is not compatible with dry storage systems currently in use at civilian nuclear power plants.
- Many utilities have specific problems with use of the proposed TAD system at specific reactor sites.
- DOE offers no meaningful alternative to the proposed TAD canister system.

Draft Rail Alignment EIS

- The draft Rail EIS includes the Mina Rail Corridor as a “non-preferred alternative.” However, NEPA requires that alternative evaluated in an EIS be capable of being selected – i.e., they must be viable alternatives. Because to Walker River Paiute Tribe has refused permission for DOE to use any portion of its reservation for the proposed rail spur (and without such permission the Mina route cannot be used), it is inappropriate for DOE to have included Mina as an alternative for comparing rail corridors in the draft EIS. The mina route is not viable and should have been excluded from the EIS.
- The Rail DEIS No Action Alternative is also inappropriate and perhaps unlawful. If DOE does not select the Caliente or Mina rail alignment, the DEIS states that the future course “is uncertain.” In fact, if rail access to Yucca Mountain is not implemented, the NO Action alternative would be legal-weight truck shipments. The repository SEIS should have evaluated the impacts of a legal-weight truck transport system nationwide and within Nevada.
- DSEIS Does Not Adequately Address Transportation Safety and Security.
- It does not consider worst case accidents - such combinations of factors “are not reasonably foreseeable”.
- It underestimates consequences of severe accidents involving long duration fires.

- It underestimates consequences of terrorist attack.
- It dismisses potential for human error to exacerbate consequences of accidents or terrorist attacks.
- Dismisses potential for unique local conditions to exacerbate consequences of accidents or terrorist attacks
- The rail DEIS does not fully evaluate repository shipments into NV from CA or the impacts to Northern Nevada (especially the Reno/Sparks/Washoe County area).
- Under Proposed Action, 9,500 rail casks and 2,700 truck casks to Yucca Mountain over 50 years; if no second repository, 24,000 rail casks and 5,000 truck casks.
- Only 8% of rail shipments enter NV from CA if Caliente rail line is developed, compared to 21% if Mina rail line is developed; 32 % of truck casks enter NV from CA.
- The rail DEIS ignores potential for larger number of rail cask shipments into NV from CA for Caliente or Mina options (>4,400, or >45% of total under proposed action).
- The rail DEIS Ignores potential for large number of LWT shipments into NV from CA if there is no rail access to Yucca (>24,000, >45% of total under proposed action)

Some General Comments

- DOE's selection of the Caliente Corridor is not supported by the information presented in the Draft SEIS – the information in the DEIS does not adequately compare Caliente with other *viable* rail corridors.
- DOE's study of the Mina Corridor as a “non-preferred alternative” is not warranted given the Walker River Paiute Tribal Council's withdrawal of support.
- Because DOE has now announced that the rail line it proposes would be a “Shared Use” line open to general commerce, the USDOT Surface Transportation Board should be the lead agency that prepares the Rail Alignment EIS.
- The DOE contention that non-rail shipments would be made by over-weight trucks is unsubstantiated, and the impacts of the use of overweight truck in Nevada and elsewhere are not analyzed.

- DOE has not adequately assessed the environmental impacts of developing the Mina rail corridor, particularly the relocation of the existing rail line.
- DOE has not assessed the environmental impacts of developing the Mina rail corridor on communities and resources along the existing Union Pacific rail lines across Northern Nevada.
- DOE has not assessed the potential for larger than projected numbers of rail shipments through the Reno-Sparks area, and failed to evaluate unique local conditions in that area (i.e., the rail trench through Reno and how that might affect accident consequences as well as routing operations/exposures).